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## 215.50

### Residency (Address) Requirements

#### Overview

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**Residency required**

Applicants for the Iowa WIC Program must reside in the state of Iowa. Residency is defined as living in the state. There are no requirements for:

- Length of residency,
- Legal status,
- Immigration status, or
- Citizenship status.

Applicants who are vacationing or visiting in the state and indicate that they do not intend to remain are generally not considered residents.

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**Determining county for services**

Participants are normally served by a clinic in the county in which they reside. However, the agency can assign a participant to a clinic in another county if employment or educational demands make it more convenient for the participant to receive WIC benefits in that county.

If it is more convenient for the participant to receive WIC benefits in a county served by another agency, both agencies must agree to this arrangement.

WIC Coordinators are encouraged to assist participants in receiving WIC benefits.

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**Policy reference** MPSF:WC-99-16-P: Strengthening Integrity in the WIC Certification Process

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**In this policy** This policy contains the following topics.

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## Documenting Proof of Address

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<b>Policy</b>	Reasonable proof and documentation of current address is required for applicants at initial and subsequent certification appointments. Proof of address must be implemented in a manner that does not constitute a barrier to participation, particularly to applicants who are mobile such as a homeless persons, military personnel, or migrants. These applicants must sign a statement attesting to their address.
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<b>Definition</b>	<u>Residency</u> means establishing the location or address where an applicant routinely lives or spends the night. For the purposes of clarity, the term address is used and is interchangeable with residency.
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<b>Examples of proof of address</b>	Acceptable proof of address include the following: <ul style="list-style-type: none"><li>• Current utility bills (heat, electricity, landline phone, water);</li><li>• Rent or mortgage receipts; and</li><li>• State/local government-issued document with current address (e.g., driver's license; Iowa non-driver ID; voter registration; public assistance notification or identification such as Medicaid, MCO, hawk-i, FIP, and Food Stamps)</li><li>• Safe at Home Card</li></ul>
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<b>Unacceptable sources of proof of address</b>	Unacceptable sources for proof of address include the following: <ul style="list-style-type: none"><li>• Verification of Certification (VOC) from another state WIC agency</li><li>• Personal mail (bills, bank statements and other personal correspondence)</li><li>• Personal checks or address labels</li><li>• Mail from the local WIC office</li><li>• Matricula Consular Cards</li></ul>
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## Documenting Proof of Address, Continued

### Documenting address

The table below summarizes how to document proof of address in the WIC data system. See Policy 215.41 for more information about the form.

IF the applicant...	THEN...
has proof of address	document the proof of address seen.
has proof but did not bring it (forgot it)	<p>Verify that the participant provided proof of income/adjunct eligibility,</p> <ul style="list-style-type: none"> <li>• If no, the certification appointment may not be completed.</li> <li>• If yes, do not select “New” for the Proof of Residency section, and               <ul style="list-style-type: none"> <li>• proceed to complete a provisional certification and ask the applicant to bring proof within 30 days,</li> <li>• schedule an appointment within 30 days,</li> <li>• change the FI issuance to monthly, and</li> <li>• continue the provisional certification appointment.</li> </ul> </li> </ul> <p><u>Note:</u> A participant must provide two out of three required documents; identity, income and residency. If the participant is missing proof of residency and income then a certification may not be completed.</p>
has no proof of address due to: <ul style="list-style-type: none"> <li>• migrant status,</li> <li>• a recent move,</li> <li>• theft,</li> <li>• loss,</li> <li>• disaster, or</li> <li>• homelessness</li> </ul>	<ul style="list-style-type: none"> <li>• select “Signed statement” as the proof provided,</li> <li>• print and complete the Signed Statement for Identity, Address and Income from the WIC data system, and</li> <li>• continue the certification appointment.</li> </ul>

## Address Changes

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<b>Reporting address changes</b>	<p>Remind participants frequently to report address changes so that their records are current. These reminders can include:</p> <ul style="list-style-type: none"><li>• Verbal reminders when participants are in clinic</li><li>• Posters or signs in the clinic area</li><li>• Handout materials such as new participant information, and</li><li>• Participant newsletter articles.</li></ul>
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<b>Moving in state to another service area</b>	<p>Do not terminate a participant who reports they will be moving to another service area in the state.</p>
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<b>Moving out of state</b>	<p>When a participant reports that they plan to move out of state, generate a VOC document in the WIC data system.</p>
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<b>Related policy</b>	<p>See Policy 220.20 Verification of Certification (VOC) for more information about out of state transfers.</p>
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## Determining Migrant and Homeless Status

### Guidelines

Follow these guidelines to determine if the applicant's status as a migrant or homeless individual.

IF the applicant...	THEN...
reports a fixed and regular nighttime residence	determine whether the applicant meets the definition of a migrant. If <u>yes</u> , document migrant status in the WIC data system.
<ul style="list-style-type: none"> <li>• lacks a fixed and regular nighttime residence, <b>or</b></li> <li>• has a primary nighttime residence that meets the definition of a homeless facility</li> </ul>	identify the applicant as a homeless individual in the WIC data system.

Note: A migrant farm worker is not considered a homeless individual.

**Related policies** See these policies for related topics.

Topic	See Policy
Definition of migrant status	390.10
Definition of homeless facilities	390.30

## Changes in Contractor Service Areas

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**Background** When agency service areas change as a result of grant awards, the state WIC office presumes that current WIC participants will continue to access services in the same county.

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**Policy** The table below describes how participant records and county of service will be handled when agency service areas change.

Stage	Description
1	The state office will transfer the caseload for the county in transition to the new contractor prior to the effective contract change.
2	The two agencies affected by the change in service areas will coordinate their communication activities with participants and provide information about the sites, dates, and hours for WIC clinics after the transition.  <u>Note:</u> It is unacceptable for a WIC agency to solicit or invite participants to change their county of service.
3	After the transition, WIC participants will access services in the same county.
4	Subsequent participant requests to receive WIC benefits in a county served by another agency because of employment or educational demands will be handled as described on page 1 of this policy.

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## Immigration Status and WIC Participation

<b>Background</b>	<p>Non-citizens residing in the United States and applying for a change in their immigration status can have the application denied if found to be a “public charge.” An immigrant may be reluctant to apply for needed benefits for fear that participation in some programs could jeopardize application for legal residency or ability to re-enter the United States after traveling abroad.</p>
<b>INS policy</b>	<p>On May 26, 1999, the Immigration and Naturalization Service (INS) published a proposed regulation and field guidance about public charge. The proposed language specifically states that participation in the WIC Program will <b>not</b> result in a determination of public charge.</p>
<b>Discussing this issue with participant</b>	<p>When a participant expresses concern about WIC participation affecting immigration status:</p> <ul style="list-style-type: none"> <li>• Assure the participant that WIC is a health and wellness program, not a welfare program, and</li> <li>• Give the participant a copy of the USDA policy memorandum listed at the bottom of this page.</li> </ul> <p><u>Note:</u> All WIC agencies in the state received a copy of this policy memorandum and background material in June, 1999.</p>
<b>Reporting problems</b>	<p>Notify the state WIC office immediately if a WIC applicant or participant reports any action by INS field agents that is not consistent with this policy. Provide:</p> <ul style="list-style-type: none"> <li>• Specific details of the incident, and</li> <li>• Copies of any INS documents, if available.</li> </ul> <p>The state WIC office will notify the FNS Regional Office. INS headquarters has agreed to work with FNS to resolve any problems that may arise.</p>
<b>Policy reference</b>	<p>MPSF:WC-99-29-P: Immigration and Naturalization Service Public Charge Information</p>

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